



NORLITE CORPORATION

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May 02, 2012

Mr. William J. Clarke
Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedances Report
Kiln 1: 04/13/12 – 05/01/12
Kiln 2: 04/13/12 – 05/01/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 04/13/12 thru 05/01/12. The attached document explains each of the "malfunctions" for Kilns One & Two.

The results of the investigation concluded a majority of the waste feed cutoffs were a result of the span limit associated with the stack gas flow monitor. Norlite has met with its consultant and a vendor offering new technology to measure stack gas flow and are in the process of determining its applicability. Norlite anticipates this new technology will be determined to be applicable for stack gas measurement in its APC system. Norlite and its consultant will continue to evaluate each exceedance in order to implement the proper corrective action to further decrease the amount of MACT exceedances.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvancouver@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager

Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4 w/attachments

DCL: 2410



NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
04/13/12 - 05/01/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
4/13/2012	3:55:56	4/13/2012	3:59:53	0:03:57	63	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges	LGF Flow	Span	Adjusted Fuel Flow
4/15/2012	6:39:16	4/15/2012	6:47:41	0:08:25	64	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges	LGF Flow	Span	Adjusted Fuel Flow
4/15/2012	6:47:46	4/15/2012	6:48:01	0:00:15	65	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges	LGF Flow	Span	Adjusted Fuel Flow
4/15/2012	10:51:46	4/15/2012	10:53:24	0:01:38	66	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges	LGF Flow	Span	Adjusted Fuel Flow
4/15/2012	10:53:30	4/15/2012	10:54:14	0:00:44	67	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges	LGF Flow	Span	Adjusted Fuel Flow
4/18/2012	8:23:17	4/18/2012	8:28:27	0:05:10	68	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span/Cleaning LGF Baskets	LGF Flow	Span	Adjusted Fuel Flow/Clean LGF Baskets
4/18/2012	8:28:30	4/18/2012	8:29:14	0:00:44	69	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
4/19/2012	6:33:10	4/19/2012	6:41:04	0:07:54	70	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span / End of Burn Tank Reached/Tank Switch	LGF Flow	Span	Adjusted Fuel Flow/Switched Tanks
4/22/2012	9:15:23	4/22/2012	9:20:27	0:05:04	71	Malfunction	Strong Wind Gusts Out of the North Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/22/2012	9:40:43	4/22/2012	9:41:26	0:00:43	72	Malfunction	Strong Wind Gusts Out of the North Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/23/2012	8:13:46	4/23/2012	8:14:07	0:00:21	73	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/24/2012	4:24:18	4/24/2012	4:24:47	0:00:29	74	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/24/2012	4:37:46	4/24/2012	4:44:24	0:06:38	75	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / I & E Cleaned Probe	Stack Gas Flow Rate	Span	I & E Cleaned Probe
4/24/2012	15:33:02	4/24/2012	15:34:29	0:01:27	76	Malfunction	The Operator Entered the LGF Lime Feed Setpoint In the Incorrect Block Which Causing the Upper Instrument Setpoint to be Reached for Lime Feed	Lime Feed Rate	Opl	Entered Correct Lime Feed Setpoints
4/26/2012	1:51:54	4/26/2012	2:01:22	0:09:28	77	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges	LGF Flow	Span	Adjusted Fuel Flow
4/26/2012	2:02:01	4/26/2012	2:02:30	0:00:29	78	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges	LGF Flow	Span	Adjusted Fuel Flow



NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
04/13/12 - 05/01/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
4/26/2012	18:09:25	4/26/2012	18:10:09	0:00:44	79	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges	LGF Flow	Span	Adjusted Fuel Flow
4/27/2012	7:28:33	4/27/12	7:29:00	0:00:27	80	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
4/29/2012	13:23:24	4/29/12	13:33:17	0:09:53	81	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges	LGF Flow	Span	Adjusted Fuel Flow
4/29/2012	13:33:21	4/29/12	13:33:59	0:00:38	82	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges	LGF Flow	Span	Adjusted Fuel Flow



NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
04/13/12 - 05/01/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
4/13/2012	20:24:40	4/13/2012	20:25:14	0:00:34	198	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
4/15/2012	10:51:50	4/15/2012	11:02:36	0:10:46	199	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges/Cleaned LGF Filter Baskets	LGF Flow	Span	Adjusted Fuel Flow/Cleaned Filter Baskets
4/15/2012	11:02:55	4/15/2012	11:03:25	0:00:30	200	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges	LGF Flow	Span	Adjusted Fuel Flow
4/15/2012	17:10:34	4/15/2012	17:11:21	0:00:47	201	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/15/2012	18:14:32	4/15/2012	19:28:49	1:14:17	202	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/High CO's	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/15/2012	19:39:14	4/15/2012	19:43:00	0:03:46	203	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/15/2012	19:56:41	4/15/2012	20:12:08	0:15:27	204	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / I & E Cleaned Probe	Stack Gas Flow Rate	Span	I & E Cleaned Probe
4/16/2012	1:27:17	4/16/2012	2:33:52	1:06:35	205	Malfunction	The Kiln Was Brought Down For Maintenance on 04/23/12 to address Stack Gas and Venturi Pressure Problems	Stack Gas Flow Rate	Span	Kiln Maintenance
4/16/2012	2:47:38	4/16/2012	2:48:21	0:00:43	206	Malfunction	The Kiln Was Brought Down For Maintenance on 04/23/12 to address Stack Gas and Venturi Pressure Problems	Stack Gas Flow Rate	Span	Kiln Maintenance
4/16/2012	2:53:21	4/16/2012	2:54:15	0:00:54	207	Malfunction	The Kiln Was Brought Down For Maintenance on 04/23/12 to address Stack Gas and Venturi Pressure Problems	Stack Gas Flow Rate	Span	Kiln Maintenance
4/16/2012	5:32:49	4/16/2012	5:33:10	0:00:21	208	Malfunction	The Kiln Was Brought Down For Maintenance on 04/23/12 to address Stack Gas and Venturi Pressure Problems	Stack Gas Flow Rate	Span	Kiln Maintenance
4/16/2012	5:33:42	4/16/2012	5:34:08	0:00:26	209	Malfunction	The Kiln Was Brought Down For Maintenance on 04/23/12 to address Stack Gas and Venturi Pressure Problems	Stack Gas Flow Rate	Span	Kiln Maintenance
4/16/2012	5:34:35	4/16/2012	5:36:39	0:02:04	210	Malfunction	The Kiln Was Brought Down For Maintenance on 04/23/12 to address Stack Gas and Venturi Pressure Problems	Stack Gas Flow Rate	Span	Kiln Maintenance
4/17/2012	3:23:21	4/17/2012	3:23:45	0:00:24	211	Malfunction	The Kiln Was Brought Down For Maintenance on 04/23/12 to address Stack Gas and Venturi Pressure Problems	Stack Gas Flow Rate	Span	Kiln Maintenance

4/21/2012	14:47:19	4/21/2012	14:47:51	0:00:32	212	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
4/23/2012	22:07:45	4/23/2012	22:15:10	0:07:25	213	Malfunction	The Kiln Was Brought Down For Maintenance on 04/23/12 to address Stack Gas and Venturi Pressure Problems	Stack Gas Flow Rate	Span	Kiln Maintenance
4/26/2012	2:02:17	4/26/2012	2:52:04	0:49:47	214	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges	LGF Flow	Span	Adjusted Fuel Flow
4/26/2012	2:55:43	4/26/2012	3:59:13	1:03:30	215	Malfunction	Inconsistent Fuel Flow Caused by Controlling Flow With Valves and the LGF Pump Surging caused the CO's to Rise	Carbon Monoxide	Opl	Adjusted Fuel Flow
4/26/2012	22:11:41	4/26/2012	22:15:08	0:03:27	216	Malfunction	Fluctuating LGF Line Pressure Plus Controlling Flow With Valves Contributed to Fuel Flow Surges	LGF Flow	Span	Adjusted Fuel Flow
4/27/2012	0:46:47	4/27/2012	0:50:26	0:03:39	217	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
4/27/2012	0:53:38	4/27/2012	1:15:51	0:22:13	218	Malfunction	Inconsistent Fuel Flow Caused by Controlling Flow With Valves and the LGF Pump Surging caused the CO's to Rise	Carbon Monoxide	Opl	Adjusted Fuel Flow